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Memorandum

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To: BRIAN J. SMITH
Deputy Director
Planning and Modal Programs

Date: July 28, 2003

File: 09-30520K


From: F. KATY WALTON
Deputy District Director
Planning and Programming - District 9

Subject: Feasibility Analysis Report on Potential Mitigation for the use of State Route 127 for Heavy-Haul Shipments of High-Level Radioactive Waste to Yucca Mountain

Recent newspaper articles have highlighted the U.S. Department of Energy's (DOE) intent to use State Route 127 (SR 127) for the shipment of radioactive transuranic wastes to the Waste Isolation Pilot Plant in New Mexico. Commencement of these shipments has been delayed due to concerns raised by our congressional delegation and by the Governor's Office. If these shipments begin on SR 127, DOE will be regularly using that route for both low-level shipments to the Nevada Test Site and WHIPP shipments to New Mexico.

District 9 has been monitoring the use of SR 127 for these shipments, and has expressed our concern regarding the potential use of that route for high-level radioactive waste to a repository at Yucca Mountain, Nevada. While DOE has expressed a preference for rail shipments, there is currently no rail line to the site. Construction of a spur across Nevada, a state that strongly opposed the repository site, is likely to be contentious.

Because of the possibility of intermodal shipments, District 9 has examined the use of rail to a transfer site in the Barstow area followed by heavy-haul truck shipments on SR 127. Our concerns on the route have focused on the lack of an engineered section, flash floods that cross the facility, and the narrow, winding, rural nature of the roadway.

The attached Feasibility Analysis Report (FAR) describes potential impacts and resultant remediation, which would be needed, should SR 127 be proposed for heavy-haul shipments of high-level radioactive waste to a repository at Yucca Mountain. The FAR is intended as an overview, and provides a rough estimate of

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the expense involved in preparing this highway to safely accommodate these extra-legal shipments. Further impacts to the environment, socio-economic, and emergency response would need to be considered, and a PSR would need to be prepared before any mitigation could occur. Copies of the FAR have been provided to the California Energy Commission and the California Highway Patrol.

DOE's current schedule indicates that shipments to Yucca Mountain should commence by 2010. As the policy debate begins on the mode and routing of these shipments, I feel you should have the enclosed FAR information available to you. Please contact me if you need additional information or have any questions.

Enclosure: SR127 Feasibility Analysis Report

c: Tom Hallenbeck, District Director
Brad Mettam, Project Manager